

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re:	:	Bankruptcy No. 16-10148-TPA
James Wayne Girts,	:	Chapter 13
Debtor	:	
	:	Document No. 62
James Wayne Girts,	:	
Movant	:	
	:	
v.	:	
	:	
First Niagara Bank, NA,	:	
	:	
AND	:	
	:	
Ronda J. Winnecour/Esquire	:	
Chapter 13 Trustee,	:	
Respondents	:	

**CERTIFICATE OF NO OBJECTION REGARDING MOTION FOR LOSS  
MITIGATION**

The undersigned hereby certifies that, as of the date hereof, no Answer, Objection or other Responsive Pleading to the **MOTION FOR LOSS MITIGATION**, filed on August 23, 2016, has been received. The undersigned further certifies that the Court's docket in this case has been reviewed and no Answer, Objection or other Responsive Pleading to the Motion appears thereon. Pursuant to the Notice of Hearing, Objections to the Motion were to be filed and served no later than September 6, 2016.

It is hereby respectfully requested that the Order attached to the Motion be entered by the Court.

Date: September 7, 2016

Respectfully submitted,  
/s/ Daniel P. Foster, Esquire  
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Attorney for Debtor

**CERTIFICATE OF SERVICE**

I, the undersigned Paralegal of Foster Law Offices, LLC, certify under penalty of perjury that I am more than 18 years of age, and that I served a true and correct copy of the **Certificate of No Objection Regarding MOTION FOR LOSS MITIGATION**, by First-Class Mail, U.S. Postage Paid on the parties below.

Executed on: **September 7, 2016**

*By: /s/ Anne M. Clement*  
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Ronda J. Winnecour, Trustee  
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